



topDNS Best Practice Webinar: A partnership to empower domain name registries to disrupt CSAM

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Lars Steffen: Good morning, good afternoon, good evening. Welcome to the TopDNS Best Practice webinar, a partnership to empower domain name registries to disrupt CSAM. My name is Lars Steffen. I am Head of International Digital Infrastructures and Resilience at eco, the Association of the Internet Industry, and I'll be your host today.

We have, two speakers today and I warmly welcome Will Few. He is Development Officer at the Internet Watch Foundation and Brian Cimboric, Chief Legal and Policy Officer at the Public Interest Registry, the registry of org.

This webinar is, as you can see in the title, one of one webinar in a series of, several webinars. We already have a number of webinars in the top DNS best practice, series where you can see different approaches, how to find abuse online, how to create evidence, and many other topics we cover at the TopDNS initiative. If you would like to learn more about TopDNS, please go to the website TopDNS dot eco, where you can find all the partners and all our activities, and where you can also see the recordings of the previous webinars and also all documents that we created in this webinar. This is an initiative that has been created two and a half years ago to fight DNS abuse at the eco Association.

With this, I would like to hand over to the first part of the webinar to Will Few, and he will introduce you to the IWF and the work that they are doing on fighting CSAM. The floor is yours.

Will Few: Thank you very much, Lars, and yeah, thank you very much for inviting me along. Thanks also to Sasha, and of course to Brian from PIR. Thank you. Yeah, I'm going to be talking a little bit about what we do, and what we're doing with PIR, obviously, just to start off, this is child sexual abuse going to be talking about. It's not a pleasant topic, but I really do appreciate you all coming along to hear about it, and hear about what you can do to help, but just a warning that it is quite a graphic topic.

So, we are the Internet Watch Foundation. we're a not for profit NGO, and we help victims of child sexual abuse by finding and removing the images and videos of their abuse from the Internet. That's our goal, that's our vision as an organisation, is an Internet completely free of child sexual abuse material, images and videos.

Now, we take reports, which are received here at our locations here in Cambridge in the UK, and our analysts take them, they assess those reports, and if criminal, if they are child sexual abuse material, we take the steps to remove them from the Internet. We have an MOU specifically with the National Police Chiefs Council here in the UK, so we are the official takedown body for anything hosted within the UK. The gold standard way, of course, of getting rid of criminal content is with the host, and that's what we do, if it's hosted within the UK. We are legally allowed to issue that takedown notice.

Often, over 99.9 percent of the time, it's hosted outside the UK, in which case we work through an organization called INHOPE, which is the International Collection of Reporting Hotlines throughout the world, and that's essentially how we work with them. We pass those reports onto those countries' hotlines, and they remove the content in line with their laws and jurisdictions. Where there isn't a hotline, we work with Interpol to ensure that the content is removed. We are also the reporting portal for 53 nations around the world, which sort of gives a place for anyone reporting within those nations to report directly to our analysts here in Cambridge in the UK, and, as with any other reports, if criminal, we take the steps to remove it from the Internet.

So, that's just a brief little starter for us. I would like to start with a bit of a case study of one of the children that we see in the images that our analysts see, unfortunately, on a daily basis. So, this is the story of Olivia. She's a small girl, bright, big, green eyes, golden brown hair, and unfortunately, we saw her being abused at around the age of three years old. This was in a familiar place to her, likely her home, and there was someone in there that she should have trusted, an older person, an older man, someone that she knew, clearly, and, as I say, should have trusted. Unfortunately, over the course of about five years, we saw him abuse her on multiple occasions. He would always obfuscate his face, he was never able to be identified visually, and unfortunately we saw Olivia grow up with abuse happening to her. In every image we saw, she would be getting slightly older and older.

Now, we know she was rescued by police, aged 8, which is fantastic, but that was years ago. We still see that abuse of Olivia happening.

Unfortunately, we also see it partly in a commercial aspect as well. There are people making money out of Olivia's abuse, out of those images of her torture and rape.

And then, that last bullet point is really the key one, really. I wish I could tell you that Olivia was unique in this. Unfortunately, she isn't. There are thousands like her.

So, just to give you a bit of a scale of the problem in 2023. We launched our annual report last week, for everything that we saw, on the Internet with regards to child sexual abuse in 2023, and of that, we saw 392,000 reports come to us. Now, each one of those reports will have had eyes on from one of our analysts here in our hotline. Every single one, eyes on.

Of those 392,000 reports, over 275,000 reports were confirmed to contain images or videos of child sexual abuse material. Now, each one of those reports might have one image of child sexual abuse, it might have thousands of images and videos of child sexual abuse, so, in terms of the number of images and videos we took down, it would be well within the millions. The key discrepancy between those two is, we do take reports from the public. They're not always on remit, and that's really how we get the first lot of our reports is from the public, but we are also able to proactively search the Internet for child sexual abuse material.

We were asked to do so by the the Prime Minister of the UK 10 years ago in 2014, and that's really where we get the bulk of our content is from our proactive searches. Our analysts are the best at what they do. They know where to find this content and how to most effectively remove it.

Now, one trend which we have been seeing growing since 2020, since lockdown, is the rise of self-generated child abuse material. This is where a child, usually in the safety of their own home, perhaps their bedroom, maybe the bathroom, and they're being groomed, coerced, tricked, exploited, from someone that isn't who they say they are on the other side of their laptop or of their phone, interperforming sexual acts on themselves. Unbeknownst to that child, that offender on the other side is recording everything and then publishing it, and again, often for commercial gain. This, although it was something we were noticing before lockdown, it really is now the majority of what we see. A fairly nasty trend that we saw last year in 2023 is the rise in reports of this happening to seven to ten year olds, so, of that year, 104,000 were of seven to ten year olds that had been groomed, as I say, coerced, tricked, into performing sexual acts on themselves. So, that's a real increase. Usually, the age range we've seen most of is 11 to 13 year olds. It's mostly girls, as well. And, unfortunately, that Category A is the most severe type of abuse that we deal with, according to UK Sentencing Council guidelines. That has also been on the rise.

So, when we're collecting data, when we're actioning content, we're able to collect an awful lot of data. That data we're able to turn into datasets, into lists, into alerts, and provide on to our members. As I say, we're a not for profit organization, we get most of our funding from our members, from those in the Internet industry. Those are people like Amazon, like Apple, like Google, Meta, TikTok, all those guys. We're also very pleased to have quite a few members within the domain registry space, so people like Verisign, Identity Digital, XYZ, and GoDaddy Registry.

We're also very pleased to have PIR as one of our members too, and they have sponsored the use of two of our key services, one of our lists, and one of our alerts, which are specific to the domain registry industry, specifically so those TLDs can be protected. I'm just going to go into a bit of detail about those.

Firstly, it's the domain alerts: If a registry signs up to take the services, via the sponsorship from PIR, one of the services they can receive is the domain alerts. Essentially that's an alert every time we see the instance of child sexual abuse identified on a gTLD or ccTLD within that registry's TLD portfolio. That's the key thing.

It might be dedicated, in which case it can, of course, be suspended, but it can, of course, be from an abused site as well, a site that is completely non-complicit, doesn't want that content there, maybe that site offers user-generated uploads, in which case we'll send that alert to the registry to note of the abuse that we have seen.

Now, this might often just be one report on one webpage within a site, in which case it acts just as a sort of an FYI to give you an overview of the abuse taking place within a certain TLD, but we know it can be useful. Of course, actioning content at TLD level, at the domain registry level, isn't a perfect fit. We know it can be quite a good way, especially the suspension of it. We know that sites, they do hop around from host to host, so the full string will remain the same, the full domain will remain the same, but if we're able to suspend it at the registry level, then that really does help with keeping that content offline.

It might be, as well, on an abused site, that there are a lot of reports coming through from that site, and in which case the registry may want to look at the volume and the regularity of the alerts coming through and take a decision on their own.

We've then also got the TLD hopping lists as well. Now this is a list of strings that we have noticed, where we have seen content, particular brands, particular sites, hopping from one TLD to another. Now, this is specifically dedicated, and or commercial content, so this is sort of the worst of the worst.

The example that we've got there is watchfoundation as the string, and then we've got it on dot info. So, if we see watchfoundation dot info, as we say, we'll work with the host to get that removed, which is great. But then, we might see it pop up, watchfoundation again, the exact same site, the exact same content, but it's on dot net. Again, we work

through the host, we get that removed, and then that third time we see it come up, that's when we put that string, watchfoundation, on the list. The key thing is, it really is just that exclusively, commercial dedicated content, and it has had those three hops each time. As I say, with all our reports, it has had eyes on from one of our analysts to confirm that it is child sexual abuse material. So, that's a good one to prevent that abuse from coming live onto your TLD.

Just to give you a bit of an idea of the sponsorship so far: we've been going for, I think, it's just under two months or so, and yet nine registries so far signed up, which has allowed for millions of domains to have that new protection, which is fantastic. Since launching it as well, we've also had three current members of the IWF get in touch and take the extra service, the Domain Hopping List, which means there is quite now a significant amount more covered, which is great news.

And again, those are registries that cover gTLDs and ccTLDs, both covered.

In terms of the process, as we see it, we hope it's a very straightforward one. Essentially there's an application form where you just tell us a little bit about yourselves, we then run a slight bit of due diligence. Once that's all complete, we ask you to sign a license, which is just a couple of pages long, which is direct by Adobe Sign. Once that's signed, then we can get you going on services, and you can take one or both. And, yeah, please do get in touch.

Likewise, there is further ways if you do want to support us, that's becoming a member in your own rights, or donating and doing things within your organization to help raise money for us, and you can be assured that every penny, every cent, that comes to us will go directly towards the running of our hotline, and helping us in our daily challenge of removing child sexual abuse material.

So, that's it from me. I'll now end the slideshow, and pass over to Brian.

Brian Cimbolic: Thank you so much.

Hello, everyone. I am Brian Cimbolic, I'm Chief Legal and Policy Officer at PIR, Public Interest Registry. First, thank you, Lars, and to eco and TopDNS for having me, and thank you, Will, for your presentation and the amazing work that the Internet Watch Foundation does.

So, if Will did a great job summarizing what the program is, what the sponsored programs are, I'm here to talk to you about why is PIR sponsoring the programs, and also, as a sort of consumer, as a registry operator, how do you implement these programs?

So first, just a little bit of background for those of you who are not familiar with Public Interest Registry, or PIR. We are the nonprofit registry operator of dot org, as well as several other mission driven top level domains, TLDs like dot charity, dot foundation, etc. Dot org has approximately 10.9 million domains under management, and of all the large legacy top level domains, we tend to be the cleanest, the least abused, and that is by design, because one of the things that sort of sets us apart is that we are a nonprofit.

Like the Internet Watch Foundation, we're a nonprofit and we have a charitable mission, and part of that charitable mission is really leaning into the anti-abuse field and helping to create practices, not just for our own TLDs, but for the industry as a whole. We've done that in a few ways.

Many of you might be familiar with an initiative called the DNS Abuse Institute, which we created three years ago, that provides free tools to registries, registrars, as well as people that want to report DNS abuse or technical abuses online. We also help to create a document called the Framework to Address Abuse, which I'll be speaking on a little here today, which has more than 50 registries, both from the gTLD space as well as the ccTLD space, and domain name registrars, that serves as a sort of code of conduct for what a registry operator or a registrar must do with certain forms of DNS abuse, that's now codified in our agreements with ICANN, as well as what we should do when we come across certain instances of website content. One of those categories is child sexual abuse material, which is why we're here today.

So, Will touched on something that's really important, that CSAM, really the gold standard, I think Will said, is that it should be addressed at the hosting level, and that's true, but the question is, what happens when that doesn't happen, when a downstream actor hasn't remediated? Registries and registrars are often looked to as a sort of backstop to look at website content abuse, and there's often pressure from a number of different actors to have us serve in that role.

There are obviously problems with that approach. There are challenges when you use the Domain Name System to deal with website content abuses, and I think that the Framework to Address Abuse summarizes this well, is that registries and registrars don't have the ability to surgically remove a particular piece of content. We can't only remove the bad part of a domain, we act at the entire domain name level, or we don't act at all, from a technical perspective, and there's a real danger, when you do that, of creating collateral damage.

I'll give you a real world example. If you think of the domain name craigslist dot org, or craigslist. In the U. S. at least, that's based on dot org. If someone were to post a post on craigslist dot org offering to sell narcotics, or uploaded a CSAM image to Craigslist, and this is just hypothetical, we actually don't have any problems with Craigslist, but if someone were to do so, then, as the registry the only technical option we have is to suspend the domain name.

Yes, that post would not be accessible any longer via the domain name system, but while that's true, that's also true of the tens of millions of pieces of legitimate or benign content that's on the rest of craigslist dot org, so it's truly a nuclear option when you're using the domain name system to look at website content abuses.

Now, that said, the other piece of the framework, and certainly we hold true to this at PIR, is that, while that's true, there are some categories of website content abuses where the scale of harms is so great that if other actors aren't doing something, we can't just sit on our hands and do nothing. Those categories that are enumerated in the framework are child sexual abuse materials, distribution of opioids, narcotics online, human trafficking, and specific and credible incitements to violence.

Obviously, we're here today to talk about child sexual abuse material. So, PIR, we have been members of the Internet Watch Foundation since 2018, and since working with IWF, in the five years after working with IWF, we've had more than 5,700 URLs sent to us as containing child sexual abuse material. Juxtapose that to the five years before working with IWF, that number was four. We had four URLs alleged to have CSAM referred to us through our abuse inbox, and 5,700 since working with IWF. So, we discovered, early on in our partnership with IWF, it's not that the CSAM wasn't there, it's that we didn't have the tools necessary to identify it and didn't know what to do when we did.

So, that's what brings us here today, we're here to share this critical tool, what IWF has enabled us to identify and remove CSAM when we can. We want to offer that to all gTLD and ccTLD registries. Will has gone over what the programs are. I just want to note that, from our perspective, we view these as opposite sides of the same coin, where there is both a proactive approach that's being offered here as well as the reactive approach with the domain alerts where registries are notified of CSAM, as well as an element to help prevent the spread of CSAM. With the distribution of the TLD Hopping List.

We're doing this because PIR, as I said, we are a nonprofit with a charitable mission, and we think that this program can help registries do their part in trying to eliminate child sexual abuse materials in their TLDs, and when that's added up, across the DNS.

So, Domain Alerts, let's talk about the program. Domain Alerts is the reactive component of this program, and when I referenced that 5,700 URLs that were sent to us, that's what I was referring to. Those were Domain Alerts that we processed from the IWF. So, what happens is IWF will send the registry defanged URLs, there's no images, there's no clickable content even. What the registry then does, at least what we do, is we work with the registrar, to work with the registrant in turn, to get that content removed.

Because, as Will noted, overwhelmingly, at least for dot org, at least in our experience, overwhelmingly the URLs get sent to us are on benign file sharing sites, they're not sites dedicated even of pornography, let alone child sexual abuse materials. They're generic file sharing sites, where a user has violated the terms of that site and uploaded some

child sexual abuse material. So, to be clear, the goal of Domain Alerts is not suspension of domain names, it's to get the content removed so that we don't have to suspend the domain name.

Now, of course, there are limited instances where there are sites that are dedicated to CSAM, and IWF flagged that for us. In those instances, we don't hesitate, we're very happy to directly suspend the names in that case.

On the preventative side, there's also the distribution of the TLD Hopping List, and I also want to give a shout out to Identity Digital. PIR, Identity Digital, and IWF developed this, the TLD Hopping List, as a pilot program a few years ago to protect both against the registration of these domain names, but it also helps protect the reputation of the TLD. You don't want your TLD associated with sites dedicated for commercial distribution of CSAM.

This is a very easy program to implement. If you work for a registry, you know how simple and straightforward it is to either reserve the name, making it unregistrable, or, of course, you can also register the name in the registry's name, whatever mechanism is fine, as long as, you get the TLD hopping list, you make it so that those names that are on that list are not able to be registered by the bad guys, because, as Will pointed out, there's sort of brand recognition with these sites that are dedicated to CSAM, and when it jumps from one TLD to the other with the same name, just in a different TLD, with the same content, the end consumer of that CSAM associates with that brand.

If you take that domain name off of the DNS, and prevent just hopping from one top level domain to another, obviously it doesn't solve the problem of child sexual abuse materials online, but what it does do is it introduces friction and makes it harder for that bad guy to just use that same brand, and jump from top level domain to top level domain, and, if you think about it, the more registries that participate in this TLD Hopping List, the more real estate that's covered so that those domains can't continue to propagate across the DNS.

I did want to note, too, that this is a new service for IWF, so even if you're a registry that's already an existing member of IWF, please do contact IWF to see, how you can enroll to receive the TLD Hopping List.

With that, I think I can hand things back over to you, Lars, so that we can hopefully get some questions.

Lars Steffen: Thank you, Brian. Thank you.

Just very quick and simple, if I'm now interested in this sponsoring program, who should I contact? Where should I go to?

Will Few: Sure, you can just get in touch with me, or anyone at the team, that's no problem at all. Likewise, you can also get in touch with Brian. I don't think there's any issue there. The first thing, if it comes to me, if it comes to Brian, if it comes to someone else in the IWF team, it will send you towards that application form, just where you give that information about yourself, about the company, and about the TLDs to be covered, and if you want one service, or if you want both, just basic information like that.

Brian Cimboric: And that's a super important point to make, Will. It's not an all or nothing. You don't have to receive both. That's it.

Will Few: Absolutely.

Brian Cimboric: If you're only comfortable on the preventive side, and just want to take the TLD Hopping List and not deal with Domain Alerts, that's a totally fine option.

I remember the first time CSAM was alleged to come through the abuse desk, and it's an intimidating process. You're like, what do I do? What do I do now? And so, if you sign up for these services, you're not really starting from scratch. We've provided IWF with some materials that serve as guidance.

It's not legal advice, it's just how we have handled these in the past, including SLAs on when you want the content removed, so you start with a sort of a playbook so that you don't have to start from scratch and figure out what to do on your own. You at least have some sort of guidance as to what to do when you receive your first domain alert, to the extent you receive any from IWF.

Lars Steffen: And do you also create a community of those who are now participating in the sponsoring program, or is this something that you hand individually with every party that is participating?

Will Few: Individually, with each one. In terms of the lists, the TLD Hopping List, it's the same list that everyone gets, there's no difference in terms of what's on that list, compared to what PIR get, compared to what anyone gets. The domain alerts themselves, they're obviously very bespoke to that TLD, so every time we send an alert, it will be specifically that we found content on that TLD.

Brian Cimboric: And I want to be clear that, while PIR is sponsoring these programs, that's the extent of our involvement. Although I'm happy to answer any questions on how we operationalize these things, we won't receive any other TLD's domain alerts, we're not involved in any way, we're not part of the licensing agreement between any other registry and IWF. We're really just here to help get it set up, and then we are out of the process, all of those interactions happen between IWF and the registry. I know, if I was another registry, I wouldn't want some third party getting my reports. So, just wanted to clear the air, that that is not part of the equation.

Lars Steffen: Thank you. Perfect, thank you very much.

And we've got one hand from Jutta Croll. Jutta, would you like to take the floor?

Jutta Croll: Yes. Thank you, Lars, for giving me the floor. As a representative of an NGO from Germany, I'm wondering what could we do in that case?

Fundraising is a difficult issue, always, but would it be useful to campaign for registries to, to join the effort? And, do you have anything that you could provide us for campaigning, like advocating for, Okay, registries go on and join the program?

Brian Cimboldic: I can jump in on this and just note that, yes, please, as you're having conversations with registries, please encourage them. I would ask them a few questions. One, are you already an IWF member? If not, think about joining. There's great benefits of being a member, but if not, and if you don't want to be a member, from this program's perspective, that's okay. You can still receive these services at no cost.

So, please encourage them to take advantage of these services because, again, the more registries that participate, if every registry participated in this, it would mean coverage for the entire Domain Name System, which is amazing, which is excellent. As Will's already pointed out, there's now 16+ million domains that are covered that weren't just three months ago. We're sponsoring this, we would love to see the entire DNS covered by this program.

I think, as far as pointing them to resources, the link has a lot of information for that registry about what these programs are, and they'll understand what that means, and also, again, I'm happy to serve as a resource to any registry that's curious about implementing either program.

Jutta Croll: Thank you.

Will Few: Absolutely. I couldn't echo Brian's points more, please do share as far and as wide as you possibly can, that would be fantastic if that's all right. Our comms team, as well, do a lot of fantastic work of pushing the content out on socials, so obviously if you're able to reshare all that kind of stuff, that would be fantastic too.

Jutta Croll: I just wanted to say thank you to both. Thank you.

Lars Steffen: Thanks Jutta.

Will, Brian, thank you very much for introducing us to your program. , I think this is very encouraging, and it's a great way to tackle one of the worst types of abuse that we have out there, if it's not the worst type of abuse out there, and I think every effort that we as

an industry can provide to fight this type of abuse is more than welcome, and to lower the barrier to have access to information to fight this type of abuse.

eco is also, via INHOPE, involved in this work. We are running the German-speaking tip line in that regard as well, I also shared this information with our colleagues in that network. We will also spread the word through these types of channels.

So, thank you very much for setting up this great collaboration, and I think everyone who's now on this webinar will be encouraged to share the information, to make it available.

Before we close the meeting, Alan, you just raised your hand. Alan, the floor is yours.

Alan Woods: I'm so sorry. It was just as you were saying that about encouragement. This is not about me or CleanDNS, but if any person out there is a member of CleanDNS, we will also be able to do these escalations on your behalf as well. So, just to let you know that, if you want to talk to us and get onto this list, please just reach out to anybody at CleanDNS, and we'll get you in touch with the right people, and have a real easy way of you to deal with this in future.

So, apologies, it's not about CleanDNS, it's about making sure that the most registries have the access to this.

Lars Steffen: Perfect, great, thank you for the useful and very important comment. Thank you, Alan.

So, with this, I think everything has been said about this great project. Thank you, Will. Thank you, Brian. Thank you for taking the time. Thank you for presenting. Hopefully, we can reconvene in a few months to see the progress and the outreach that you've done, and the more improved fight on CSAM online, would love to see you back and talking about the results.

And with this, thank you again, thank you for everybody who participated in this webinar, thank you for your interest.